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May 1, 2020

**BY ECF**

Honorable Edgardo Ramos  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Roman Perez et al v. Sunflower Amsterdam LLC et al  
Index No. 18-cv-5875 (ER)

Dear Judge Ramos:

This office represents Plaintiffs in the above referenced matter. We write pursuant to the Court's order of April 6, 2020. Between April 6<sup>th</sup> and the present, we have made attempts to contact Defendants, none of which were successful. As such, this letter is submitted without their input.

On January 30<sup>th</sup>, 2020, this Court granted Defendants' former counsel leave to withdraw as attorneys of record. The Defendants were instructed to find new counsel within thirty days of that time. To date, no new counsel has filed an appearance, nor does it appear from the docket that Defendants have taken any action at all. Plaintiffs thus plan to seek an entry of default against Defendants.

We thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Clela Errington

Clela A. Errington, Esq.  
Michael Faillace & Associates